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March 24, 2011

CERTIFIED MAIL; RETURN RECEIPT REQUESTED

Certified No. 7007 2680 0002 6207 4197

Mr. James Rebarchak

Environmental Program Manager for Air Quality

Pennsylvania Department of Environmental Protection

Southeast Regional Office

2 East Main St.

Norristown, PA 19401

Subject:

40 CFR 63, Subpart ZZZZ

Initial Notification per 40 CFR 63.9(b)(2)

1,500-kW Emergency Electric Generator

GlaxoSmithKline, Upper Merion, Pennsylvania IES Project No. EHS10101.13

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Dear Mr. Rebarchak:

On behalf of GlaxoSmithKline Pharmaceuticals (GSK), IES Engineers is pleased to submit the following information that is required by the Initial Notification requirements of the above-referenced regulation:

(i) The name and address of the owner or operator:

GlaxoSmithKline Pharmaceuticals 1250 South Collegeville Road Collegeville, PA 19426

(ii) The address (i.e., physical location) of the affected source:

GlaxoSmithKline Pharmaceuticals 709 Swedeland Road King of Prussia, PA 19406

(iii) An identification of the relevant standard, or other requirement that is the basis of the notification and the source's compliance date:

This initial notification is being submitted by March 31, 2011, in accordance with 40 CFR 63.6645(f) and 63.9(b)(2). Since this 1,500-kW (2,200 bhp) diesel-fired internal combustion engine/electric generator (EGEN) is used only for emergency purposes, there is no relevant standard that applies to it under 40 CFR 63, Subpart ZZZZ, except for the initial notification requirement that this letter fulfills.



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(iv) A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted:

This 1,500-kW (2,200 bhp) diesel-fired internal combustion engine/electric generator (EGEN) is used only for emergency purposes. It was manufactured by Detroit Diesel and installed at the Upper Merion facility following receipt of the Department-approved Request for Determination No. 1834 on November 30, 2010. The types of pollutants emitted from this EGEN include: NO_x, CO, SO_x, PM, non-methane hydrocarbons, and *de minimis* amounts of HAPs, including formaldehyde from the combustion of diesel fuel.

(v) A statement of whether the affected source is a major source or an area source:

The GlaxoSmithKline site in Upper Merion, Pennsylvania, is a major HAP source because the facility's potential to emit is greater than 10 TPY of any single hazardous air pollutant (HAP) or 25 TPY of combined HAPs.

If you have any questions, or need additional information, please feel free to contact me or Ms. Deanna Herman of GSK at (610) 917-7343.

Very truly yours,

Robert W. Schlosser, P.E. Principal Project Manager

ce: K. Cox, U.S. EPA (Certified No. 7007 2680 0002 6207 4203)

D. Herman, GSK

A. Soni, IES